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FILED

Apr 13 2021

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 OAKLAND DIVISION

10 4:21-cr-00147-HSG-1

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 NATALI CISNEROS

15 Defendant.

Case No.: CR 20-71597 MAG

STIPULATION AND [PROPOSED]  
ORDER MODIFYING CONDITIONS OF  
RELEASE TO ALLOW OUT OF  
DISTRICT TRAVEL

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17 Mr. Cisneros is charged in a one count complaint with being a felon in possession of  
18 ammunition. He made his initial appearance on March 1, 2021, and was released that day on a  
19 \$30,000 unsecured appearance bond, under standard conditions including he not leave the Northern  
20 District of California, and the special condition that he be subject to GPS monitoring and abide by a  
21 curfew. There have been no problems since Mr. Cisneros was released from custody.

22 Mr. Cisneros plays amateur football as a running back for the South Beach Outlaws, an  
23 amateur youth football team in the West Coast Football Alliance. The majority of the games are  
24 played in the Northern District of California, but occasionally there are games in Sacramento County,  
25 which is in the Eastern District of California. The parties thus request the Court modify Mr. Cisneros'  
26 pretrial release conditions to allow him to travel outside of the Northern District of California, and  
27 particularly to travel to the Eastern District of California, in order to play games. Pretrial Services  
28 does not oppose this request as long as Mr. Cisneros only leaves the district on game days, gives

1 them his itinerary ahead of time, and is back at his home by curfew. All other release conditions  
2 should remain in place.

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IT IS SO STIPULATED.

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Dated: April 9, 2021

MOEEL LAH FAKHOURY LLP

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/S  
HANNI M. FAKHOURY  
Attorneys for Mr. Cisneros

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Dated: April 9, 2021

STEPHANIE M. HINDS  
Acting United States Attorney  
Northern District of California

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/S  
AJAY KRISHNAMURTHY  
Assistant United States Attorney

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

4:21-cr-00147-HSG-1

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
NATALI CISNEROS,  
Defendant.

**Case No.: CR 20-71597 MAG**

**[PROPOSED] ORDER MODIFYING  
CONDITIONS OF RELEASE TO  
ALLOW OUT OF DISTRICT TRAVEL**

Based on the reasons provided in the stipulation of the parties, and the agreement of Pretrial Services, the Court hereby modifies Mr. Cisneros' release conditions to allow him to travel outside of the Northern District of California in order to play football under the following conditions:

1. He can only travel out of the District on game days;
2. He must provide his itinerary to Pretrial Services ahead of time; and
3. He must return to his home by curfew.

All other release conditions remain as previously set.

## IT IS SO ORDERED.

DATED: April 13, 2021

  
HONORABLE ROBERT M. ILLMAN  
United States Magistrate Judge